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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Mag. No. 22-15015  
 :  
 v. : Hon. Edward S. Kiel  
 :  
 MANUEL A. QUINONES : **CRIMINAL COMPLAINT**


I, Special Agent Matthew Wisdom, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the United States Drug Enforcement Administration, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:



Matthew Wisdom  
Special Agent  
Drug Enforcement Administration

Special Agent Matthew Wisdom attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A), on February 1, 2022.

HONORABLE EDWARD S. KIEL  
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Possession with Intent to Distribute Fentanyl and Methamphetamine)

On or about January 31, 2022, in the District of New Jersey and elsewhere, the defendant,

MANUEL A. QUINONES,

did knowingly and intentionally possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT TWO

(Possession of Ammunition by a Convicted Felon)

On or about January 31, 2022, in Camden County, in the District of New Jersey and elsewhere, the defendant,

MANUEL A. QUINONES,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce rounds of Blazer 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

(Possession of Firearms in Furtherance of a Drug Trafficking Crime)

On or about January 31, 2022, in the District of New Jersey and elsewhere, the defendant,

MANUEL A. QUINONES,

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl and 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, as charged in Count One of this Complaint, did knowingly possess two firearms.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

## **ATTACHMENT B**

I, Matthew Wisdom, am a Special Agent with the United States Drug Enforcement Administration (“DEA”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers and cooperating sources, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Law enforcement has been investigating a drug trafficking organization (“DTO”) operating in the District of New Jersey and elsewhere. Based on the investigation, law enforcement learned that on or about January 31, 2022, defendant Manuel A. Quinones (“Quinones”) was in possession of narcotics in a parking lot in or around East Brunswick, New Jersey (the “Parking Lot”).

2. Subsequently, law enforcement located Quinones, who was driving a white Acura (the “Acura”), in the Parking Lot. When law enforcement approached the Acura, Quinones attempted to drive away and almost rammed a law enforcement vehicle. Law enforcement eventually detained Quinones.

3. Thereafter, law enforcement introduced a narcotics-detecting canine to the Acura, which positively alerted to the presence of narcotics within the Acura. Law enforcement then searched the Acura, which contained approximately 1,000 suspected fentanyl pills and approximately seven pounds of suspected crystal methamphetamine. Law enforcement later field tested a sample of the suspected crystal methamphetamine, which field tested presumptively positive for the presence of methamphetamine.

4. Law enforcement subsequently conducted a lawful search of Quinones’ Pennsauken, New Jersey residence (the “Residence”), which was listed as Quinones’ address on his driver’s license. Among other things, law enforcement recovered approximately 2,000 suspected fentanyl pills, approximately 300 grams of suspected fentanyl powder, approximately one pound of suspected crystal methamphetamine, and approximately ten pounds of suspected marijuana.

5. In addition, inside the Residence, law enforcement recovered two firearms—a loaded .25 caliber Raven Arms pistol bearing serial number 470231 (the “Loaded Pistol”) and a .357 Smith and Wesson revolver bearing serial number N93533 (the “Revolver”)—as well as at least 41 rounds of Blazer 9mm ammunition (the “Ammunition”), a drum magazine, capable of holding

approximately 40 rounds of 9mm ammunition, and a bulletproof vest. Notably, the Loaded Pistol was found in the same closet as approximately one pound of suspected crystal methamphetamine, and the Revolver was found in the attic in proximity to approximately ten pounds of marijuana and the bulletproof vest.

6. Prior to knowingly possessing the Ammunition on or about January 31, 2022, Quinones knew that he was a convicted felon, as he had at least one felony conviction, including a conviction on or about July 13, 1998, in Camden County Superior Court, for violation of N.J.S.A. § 2C:35-7, a crime punishable for a term exceeding one year, and for which he was sentenced to five years' imprisonment, and a conviction on or about June 6, 1995, in Camden County Superior Court, for violation of N.J.S.A. § 2C:20-7, a crime punishable for a term exceeding one year, and for which he was sentenced to four years' imprisonment.

7. The investigation has shown that the Ammunition was manufactured outside the State of New Jersey and thus necessarily had to travel in interstate commerce prior to Quinones' possession of the ammunition in New Jersey on or about January 31, 2022.

8. Based on the investigation, the Revolver and the Loaded Pistol appear capable of, and designed to, expel projectiles such that they each meet the definition of a firearm under federal law.